

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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In re FLINT WATER CASES

CIVIL ACTION  
FILE NO. 5:16-cv-10444

Hon. Judith E. Levy

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**CO-LIAISON COUNSEL'S PROPOSED AGENDA ITEMS  
RELATED TO NOVEMBER 30, 2022, STATUS CONFERENCE**

Co-Liaison Counsel hereby submits the following proposed agenda items for the conference scheduled on November 30, 2022:

1. Co-Liaison Counsel has noticed the deposition of **Pierre Farcot**, Veolia Environnement's Project Manager for the Communications Director and Special Advisor to the Chairman at Veolia, Responsible for Crisis Communications, for November 30, 2022.

- Mr. Farcot was in Court for virtually the entirety of the Bellwether I trial.
- Mr. Farcot was responsible for the Twitter account @VNAFlintFacts.
- Mr. Farcot was responsible for the website VeoliaFlintFacts.com.

Veolia refuses to produce Mr. Farcot for the deposition.

2. Co-Liaison Counsel has served a deposition subpoena on **Laurent Obadia**, Veolia Environnement's Director of Communications, for November 4, 2022.

- Mr. Obadia was responsible for public trial/litigation communications during the Bellwether I trial.
- Mr. Obadia has been previously deposed, but there are topics counsel was not aware of at the time of his prior testimony, namely his role in public communications during the Bellwether I trial, which obviously occurred after his deposition took place.

Veolia refuses to produce Mr. Obadia for the deposition.

This, the 22<sup>nd</sup> day of November 2022.

**LEVY KONIGSBERG, LLP**

/s/ COREY M. STERN

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**CERTIFICATE OF SERVICE**

I hereby certify that on November 22<sup>nd</sup>, 2022, I caused the within pleading to be served electronically on counsel of record for all parties to the above-captioned action at their e-mail addresses on file with the Court.

**LEVY KONIGSBERG, LLP**

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